

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ALTPASS LLC,

Plaintiff,

v.

**GUANGDONG OPPO MOBILE
TELECOMMUNICATIONS CORP.,
LTD**

Defendant.

CIVIL ACTION NO. 2-20-cv-00233

JURY TRIAL DEMANDED

PLAINTIFF'S MOTION TO DISMISS WITH PREJUDICE

Plaintiff Altpass LLC (“Plaintiff”), pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, hereby moves to dismiss **with prejudice** all claims by Plaintiff against Defendant Guangdong Oppo Mobile Telecommunications Corp., LTD. (“Defendant”). Each party shall bear its own costs, expenses, and attorneys’ fees.

DATED January 25, 2022

Respectfully submitted,

By: /s/ Hao Ni
Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com

NI, WANG & MASSAND, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

*ATTORNEY FOR PLAINTIFF
ALTPASS LLC*

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of January, 2022, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Hao Ni

Hao Ni